April 3, 2025

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: **Notice of Ex Parte Communication**, *Achieving 100% Wireless Handset Model Hearing Aid Compatibility*, WT Docket No. 23-388; *Delete, Delete, Delete,* Docket No. 25-133

Dear Ms. Dortch:

On April 1, 2025, the Technology Industry Council (ITI) and the Mobile & Wireless Forum (MWF), on behalf of its respective members held a virtual meeting with representatives of the FCC to discuss e-labeling via the use of QR codes. A list of attendees is set out below. The meeting's purpose was to discuss the FCC's current limitations on the use of QR codes and request that FCC consider an expanded authorization whereby QR codes may be used for inside materials, packaging and devices.

The meeting followed the agenda and order of presentation set out in the attached slide deck. It was first noted that QR codes have become ubiquitous and well-accepted. There was general acceptance by the FCC of that statement, which aligns with the FCC's Cyber Trust Mark initiative. The thrust of the associations' position was that, given the FCC's clear approval of QR codes in both the CTM R&O and in the recent HAC R&O the FCC should resolve inconsistencies between the resulting rules to develop an agency-wide approach to expanded QR code use. At the outset, a more expansive authorization should be given for QR codes to (1) replace printed in package materials, and (2) be on device packaging in lieu of text and URLs to provide customers information at the point of sale.

By aligning the FCC policies on QR code use by manufacturers for consumer information and creating an agency-wide policy for their use, the FCC can reduce manufacturer and consumer confusion, providing a consistent policy for point-of-sale information. This would not amount to a new regulation, but a clarification of FCC policy and allow for continued innovation in e-labeling.

Respectfully Submitted,

/s/ Chuck Eger
Chuck Eger
MWF Counsel

/s/ Katie McAuliffe
Senior Director, Telecommunications Policy
ITI

/s/ Stephanie Barrett
Senior Director of Policy, Product Regulatory & Sustainability
ITI

Attach: slide deck

cc: all attendees

ATTENDEES:
FCC

Barbara Esbin
Eli Johnson
Saurbh Chhabra
Garnet Hanly

MWF
Chuck Eger

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Stephanie Barrett
Katie McAuliffe